

REMARKS

In response to the Examiner's Action mailed on November 3, 2009, claims 1 to 10 and 12 to 21 are amended and the Applicant would like to respectfully requests that the patent application be reconsidered and allowed.

An item-by-item response to Examiner's objections or rejections is provided in the followings:

1. Rejection of Claims Under 35 USC 112:

The Examiner rejects claims 1-21 under 35 U.S.C. 112 first paragraph as failing to comply with the enablement requirement.

In response to the rejections, claims 1 to 10 and 12 to 21 are amended and the term "descriptive naming term" is removed and a "naming term" is now clearly defined and supported by the description in the specification.

2. Rejection of Claims Under 35 USC 112:

The Examiner rejects claims 1-21 under 35 U.S.C. 112 second paragraph as being indefinite for failing to particular point out and distinctly claim the subject matter which applicant regards as the invention.

In response to the rejections, claims 1 to 10 and 12 to 21 are amended and the claim elements that lack antecedent basis or indefinite are removed and the informalities in the claims are corrected.

3. Rejection of Claims Under 35 USC 103:

The Examiner rejects claims 1-21 under 35 U.S.C. 103(a) as being unpatentable over Rivette et al., US 5,991,780 A priority filed 11/19/1993 in view of Krause et al., US 5,625,827 filed 12/23/1994.

In response to Examiner's rejections, the "naming term" in the independent claims, i.e., claims 1, 7, 13, and 19 are amended to clearly and definitely specified as a term that satisfied all three conditions set forth below:

- 1) A naming term is a term described in a textual description.
- 2) A naming term is a term that is designated in the textual descriptions with a unique alpha-numeral designation.
- 3) A naming term is a term shown as a graphic element in a drawing of the document designated by the same unique alpha-numeral designation.

In this invention, each graphic element is designated by a "unique alpha numeral designation" that is specific to the graphic element. This unique designation is necessary because it is necessary to search a naming term that is also assigned by this unique alpha numeral designation to associate with a graphic element and then display the naming term next to the graphic element. The search and display depend on a unique alpha numeral designation for each graphic element.

With the amendment, compared to Fig. 5 of Krause, the amended claims 1, 7, 13 and 19 would not be obvious under Rivette and Krause and would be allowable. Specifically, Krause discloses on Fig. 5 an unique alpha-numeral designations of "65" designated to a naming term "window" (see column 9, line 24, and line 26), and in Fig. 4, another unique alpha-numeral designation 55 designating another naming term "hotspots" (see column 7, line 44, and line 50-51). However, none of the naming terms "window" or "hotspots" have been displayed next to the graphic elements. Furthermore, the alpha-numeral designations A, B, C, are designated to "hotspot". However, Krause did not show the naming term "hotspot" next to any of the graphic elements designated by the unique alpha-numeral designations A, B, or C. For these reasons, the naming term as now amended and more clearly defined as now included in the amended claims would differentiate further from the disclosures made by Rivette and Krause. A combination of Rivette and Krause would not enable a person of ordinary skill to devise the inventions directed by the claims as now amended because Krause did not show a display any of the naming terms assigned by an unique alpha-numeral designation (both in the textual descriptions and to the

graphic element), next to the graphic element(s) as now more clearly specified in this invention.

Furthermore, the Applicant would like to respond to Examiner's points as recited in the Office Action mailed on November 3, 2090.

On pages 55 and 56 the Examiner recites that:

"Krause teaches a descriptive naming term, such as "fixed base clip", as shown in Figure 5, which is a descriptive naming term descriptive (i.e. comprehensively understandable by the reader) of the graphic element shown in Figure 5 and depicting a fixed base clip. These descriptive naming terms taught by Krause identify and describe the graphic elements to which they are associated and are displayed on the drawing immediately next to the graphic element to which they are associated, as clearly shown by Krause in Figure 5, as well as in Krause Figure 6, which presents additional examples of textual phrases that identify graphic elements and that are displayed immediately next to the graphic elements they identify, such as, by way of example, "Soffit Section" (See Krause, Figure 6)." (Underline added)

Applicant's Response:

The Applicant would like to respectfully disagree with the Examiner about Examiner's point that "Krause teaches a naming term" because Krause shows the terms "Fixed Base Clip" and "SOFFIT SECTION" in Figs. 5 and 6. The Examiner provides bases for identifying these terms as "naming term" because these terms are comprehensively understandable by the reader of the graphic element. However, according to the clear and specific languages in claims 1, 7, 13 and 19, a term appears on the drawing that is merely "comprehensively understandable by the reader of the graphic element" is NOT a "naming term". The graphic elements "Fixed Base Clip" and "SOFFIT SECTION" in Figs. 5 and 6 are NOT assigned by any alpha-numeral designation. Furthermore, even if they are naming terms, there is no way to conduct a search to associate the naming term "Fixed Base Clip" and "SOFFIT SECTION" with a segment of the textual descriptions. According to this invention, the search depends on the unique

alpha-numeral designation to associate the naming term and the textual descriptions to the graphic element both assigned by the same alpha-numeral designation based on the claims of this invention.

In contrast, the invention as disclosed of Krause does not require such an association because Krause relies on the "hotspots" to call up another file or document. According to Krause "The "A" hotspot will call up a textual description which is a note or text file named A in memory 30 as illustrated in Fig. 5" (Krause column 9, line 37 to 39). The association process and mechanism for reviewing the documents of Krause is totally different from this invention. For this reason, the disclosures as made by Figs. 4 to 7 and the descriptions of these figures in Krause point to a different invention and a combination of Krause and Rivette would not make this invention obvious. Furthermore, there are differences that clearly differentiate the invention according to the claims now amended are different from Krause and Rivette because of the following reasons:

- A) The terms "Fixed Base Clip" and "SOFFIT SECTION" as shown in Figs. 5 and 6 ARE NOT naming terms because these terms have not been described in the textual descriptions.
- B) . The terms "Fixed Base Clip" and "SOFFIT SECTION" as shown in Figs. 5 and 6 ARE NOT naming terms because these terms have not been designated by alpha-numeral designation in the textual description.
- C) The terms "Fixed Base Clip" and "SOFFIT SECTION" as shown in Figs. 5 and 6 ARE NOT naming terms because these terms have not been designated by alpha-numeral designation as a graphic element in the drawings shown in Figs. 5 and 6.
- D) The terms "Fixed Base Clip" and "SOFFIT SECTION" as shown in Figs. 5 and 6 ARE NOT naming terms because these terms cannot provide a link between the textual descriptions and the graphic element due to the facts that the graphic elements "Fixed Base Clip" or "SOFFIT SECTION" as shown in Figs. 5 and 6 have not been designated by a unique alpha-numeral designation.
There is no way to link these graphic elements to relevant textual descriptions that describe a graphic element associated by the unique alpha-numeral designation.

- II) For claims 1, 7, 13, and 19, the Examiner recites the following statements as provided on page 10 to 12 for claim 1 (and essentially similar reasons of rejections

are provided as that for claim 1 are also recited for claims 7, 13, and 19). The Applicant would like to respectfully respond to each point as the followings:

- 1) While Rivette does not teach expressly that the textual descriptions include describing said descriptive naming term designated by said alpha-numeral designation, Krause teaches textual descriptions included in a secondary document that describes said descriptive naming term, such as describing the descriptive naming term which is designated by said alpha numeral designation "A" (See Krause, Figure 5, element 65).

Applicant's Response:

- a) From the above statements as cited by the Examiner, the Applicant is not sure which is considered as the alpha-numeral designation. Is it "A" the alpha-numeral designation or "65" the alpha-numeral designation? The Examiner seems to imply that both "A" and "65" are alpha-numeral designations.
- b) Suppose both "A" and "65" are alpha-numeral designations, Fig. 5 does not show a "naming term" together with either "A" or "65". Therefore, what have been shown on Fig. 5 would not make the invention of this application obvious since there is no naming term shown immediately next to the alpha-numeral designations of the graphic elements.
- c) Even that what recited by the Examiner that "Krause teaches textual descriptions included in a secondary document that describes said descriptive naming term, such as describing the descriptive naming term which is designated by said alpha numeral designation "A" is true, it would still not make this invention obvious because what can be called up by "A" is not specifically shown in Fig. 5, as that required by the claims of this invention, and a document reviewer is still required to call up another document (either a note or a textual file" to understand what are represented by hotspot "A".
- 2) Krause teaches each descriptive naming-term displayed immediately and directly next to the graphic elements in fig. 3-5 and col. 5 lines 7-18. See specifically Krause, Figure 5, showing a descriptive naming term, such as "building paper", for example, displayed immediately and directly next to said graphic element. The graphic elements and the text labels and text descriptions are all readily available to the user on one screen.

Applicant's Response:

- a) From the above statements as cited by the Examiner, the Applicant is not sure if "building paper" is a "naming term" and what is pointed by "building paper" through an arrow is actually and indeed a "building paper" (i.e., paper covering over a vertical wall as "building paper"). Instead, a detail reading of the entire document and the descriptions of Fig. 5 would more likely indicate that the term "building paper" is not meant to show there is a "building paper" that covers the vertical wall pointed by the arrow next to the "building paper". More likely, the term "building paper" is an indicator of a "secondary document" (that is a "building plan), within a primary document. (See the description of Krause in column 9, lines 17 to 44, on "secondary document" and the "primary document" shown in different "windows 65").
- b) If the "building paper" is a naming term, then Fig. 5 and 6 do not show that "building paper" is assigned with an alpha-numeral designation. The Examiner recites that "the text labels and text descriptions are all readily available to the user on one screen", but the text labels "A". "B" are hotspots and have nothing to do with the "building paper" as a naming term, and the text descriptions shown in these figures are not related to the term "building paper" and would not help a document reviewer to understand the graphic element pointed by the "building paper". The only way that can help the reviewer is for the reviewer to call up the "building paper", i.e., another building plan as a "second document".
- c) According to above discussions, Krause teaches a totally different way of reviewing and understanding the building plans and construction blueprints. The disclosures made by Krause would not have been relevant because of these differences.
- 3) Krause teaches that the hotspots annotate a primary document and link to a textual description in a secondary document. These documents could be document parts for example in a hierarchical compound document and thus the textual description invoked by the hotspot could be part of the same document as the graphical document containing the hotspot. Additionally Krause teaches that the descriptive naming term may be described in at least one associated segment of a textual description also displayed immediately and directly next to said graphic element (See Krause, Figure 6, showing

descriptive naming term "1/A34" displayed with textual description "Soffit Section" immediately and directly next to a graphic element of a soffit section).

Applicant's Response:

- a) According to the convention of the drawings as shown in Figs. 4 to 7, the symbol "1/A34" is enclosed in a circle. The symbol "1/A34", enclosed in a circle, like other symbols "A", "B" and "C" in a circle, is a "hotspot", and not a "naming term". (Please see Fig. 4 and the description of the alpha numeral designation "55" as hotspots".)
 - b) A person of ordinary skill in document review and management when review the disclosure made by Krause would not misunderstand "1/A34" shown in a circle as a "naming term" and "soffit section" as "textual description" of the naming term.
 - c) Krause actually applies the hotspot "1/A34" as a hotspot to call up another document to review the details of the "soffit section". The soffit section is a name of the "hotspot 1/A34" and not a textual description because "soffit" is not a descriptive word and cannot explicitly and comprehensively describe the graphic element. A document must call up another document linked by the hotspot 1/A34 in order to more comprehensively understand the details of the building plan and the construction blueprints.
 - d) For these reasons, Krause teaches a totally different system and process to manage, retrieve and review document. A combination of Krause and Rivette would not enable a person of ordinary skill to devise a document review system as now direct by the claims as now amended.
- 4) It would have been obvious to one of ordinary skill in the art at the time the invention was made to have modified Rivette with Krause and teachings of Applicant's disclosure to have created the claimed invention. One of ordinary skill in the art would have taken the text of Rivette and used it to replace the numbered labels on the images, as is done in Krause, through the use of automatic link generation systems and techniques which Applicant's specification teaches were readily available in the market. It would have been obvious and desirable to make this modification such that the combined image and text information would have been easier to read.

Applicant's Response:

- a) Krause is a system to review and manage building plan and blueprints that are mostly graphic documents with very little textual descriptions, i.e. "note" that are brief descriptions, because the reviewing of the graphic is more important for these types of documents.
 - b) For reviewing of building plans and blueprints, it is more important to check different levels of details and therefore it is important to call up several levels of "primary documents" and "second documents". The disclosure of Rivette is to manage patent applications. The natures of these two systems are totally different in terms of the interests and emphases of reviewing the documents. Therefore, a person of manage a patent document would not like to refer to a document review system for managing hierarchical level of building plan files relevant.
 - c) As discussed above, since Kraus did not disclose the naming term assigned by unique alpha-numeral designation displayed with textual descriptions or naming term with the alpha-numeral designation, even a combination of Rivette with Krause would not enable a person of ordinary skill in the art to create a display as now pointed by the claims as now amended.
- 5) It is noted that in the example immediately above, "bolt" is the same thing as "12." Displaying one or the other in association with a graphic fully identifies the graphic. Associating both the name "bolt" and the number "12" in association with the graphic is more informative, but essentially duplicative. This relationship is noted in support of the conclusion that it would have been obvious to one of ordinary skill in the art at the time of the invention to identify a graphic by either the name or the number or both. The motivation for using both is for convenience is not having to look up the name associated with the number, or the number associated with the name. Therefore, it would have been obvious to one of ordinary skill in the art at the time of the invention to have modified the invention of Rivette, according to the teachings of Krause to display both a name and a number for a graphic item, as is specified in claim 1.)

Applicant's Response:

- a) The Applicant is confused by this statement because the Office Action does not seem to make reference to ""bolt" is the same thing as "12."

- b) Even that the "bolt" and "12" are meant to be pointing to the same graphic item, a graphic element merely shown with "12" may not be sufficient comprehensive to a document reviewer. The Examiner is correct that a display that shows the term "bolt" together with "12" would provide a reviewer more information to better understand the drawings and that is the main purpose of this invention.
- c) However, the Applicant would respectfully disagree with the Examiner that such display is obvious merely because "bolt" and "12" together with "textual descriptions" would be obvious. As discussed above, neither Rivette and Krause show such display, this invention disclose new, different and not obvious inventions over the disclosures over Rivette in view of Krause.

With the claims as now amended and the reasons provided above, the applicant hereby respectfully requests that Examiner's rejections under 35 USC §112 and 35 USC § 103 be withdrawn and the present application be allowed.

Respectfully submitted,

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By



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